

COHEN, FRANKEL & RUGGIERO, LLP

ATTORNEYS AT LAW
20 VESEY STREET, SUITE 1200
NEW YORK, NEW YORK 10007
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
GILLIAN M. FEEHAN*

*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90TH STREET
JACKSON HEIGHTS, NEW YORK 11372
(718) 898-4900 • FAX (718) 898-0093
PLEASE DO NOT REPLY TO THIS OFFICE

March 3, 2022

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/3/2022

**Re: *United States v. William Soto-Montanez*
21 Cr. 95 (MKV)**

Dear Judge Vyskocil:

Please recall that I represent Mr. William Soto-Montanez in his defense of the above-referenced matter. Mr. Soto-Montanez is presently scheduled to appear before Your Honor on March 10, 2022 at 2:30 p.m. for a status conference. For the reasons that follow, I write to respectfully request that Your Honor grant a 30-day adjournment of the status conference. This is the parties' fourth and final status conference adjournment request in this matter. I have conferred with A.U.S.A. Kedar Bhatia and A.U.S.A. Kaylan Lasky, and the Government consents to this request.

As Your Honor may recall, I filed my notice of appearance in this matter on October 25, 2021. Since that time, the parties have been engaged in extensive plea negotiations that required the parties to seek several adjournments. This morning, as a result of our work over the last few months, the Government provided a more favorable plea offer to my client. I have reached out to my client, who resides in Wisconsin, to provide him with copies of the relevant documents, and we have scheduled a video conference for the afternoon of Monday, March 7, 2022, to begin our review of the Government's plea offer. Because I anticipate that Mr. Soto Montanez will want to discuss the terms of the agreement with his family and again with counsel after our initial review meeting, we are seeking the instant 30-day adjournment, 10 days of which I will be out of town and unavailable to consult with Mr. Soto Montanez.¹

Therefore, the defense respectfully requests that Your Honor grant a 30-day adjournment of the status conference in the above-referenced matter. We will notify the Court and the

¹ Unfortunately, I am scheduled to be away from my office from March 11, 2022 until March 21, 2022, thus necessitating a bit more time than I would ordinarily request.


U.S. v. William Soto Montanez

March 3, 2022

Page 2 of 2

Government as soon as Mr. Soto Montanez comes to a decision and if it becomes necessary to schedule a change of plea hearing. The defense has no objection to the exclusion of time under the Speedy Trial Act. Thank you for your consideration.

Respectfully submitted,

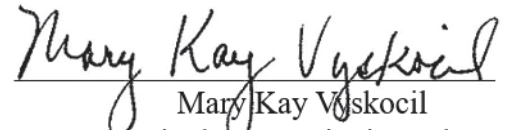

Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Kedar Bhatia (via ECF)
A.U.S.A. Kaylan Lasky (via ECF)
Mr. William Soto-Montanez (via email)

GRANTED. The status conference is ADJOURNED to April 4, 2022 at 11:00 a.m. Counsel shall appear in Courtroom 18C of 500 Pearl Street. The Court will not grant any further adjournments of this conference. On the consent of the defendant, all time is excluded until April 4, 2022.

Date: March 3, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge